

EXHIBIT 80

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND**

STATE OF NEW YORK, et al.

Plaintiffs,

v.

ROBERT F. KENNEDY, JR., in his official capacity as
SECRETARY OF THE U.S. DEPARTMENT OF
HEALTH AND HUMAN SERVICES, et al.,

Defendants.

Case No. 1:25-cv-00196

DECLARATION OF YOLANDA JACOBS

I, Yolanda Jacobs, declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. I am the President of the American Federation of Government Employees (AFGE) Local 2883. I am familiar with the information in the statements set forth below either through personal knowledge, consultation with the staff and members of AFGE Local 2883, or documents that have been provided to and reviewed by me.
2. I submit this Declaration in support of the Plaintiff States' Opposition to Defendants' Motion to Modify the Injunction.
3. I am a disabled veteran of the U.S. Army and have been deployed around the world. I am a registered neutral in the state of Georgia and a trained EEO specialist. In December 2021, I joined Local 2883 as a union steward. I have been president of Local 2883 since July 2024.
4. I am a Health Communications Specialist in the Office of the Chief of Staff for the Centers for Disease Control and Prevention ("CDC"). I have worked for the CDC since 2004,

first as a contractor and then as a full-time employee beginning in 2008. I have a bachelor's degree in Sociology and have held numerous positions throughout the CDC, including as a Technical Writer/Editor.

5. AFGE Local 2883 represents over 2,000 employees at the Centers for Disease Control and Prevention (CDC), including many who received reduction in force (RIF) notices on April 1, 2025. Our mission is to advocate for fair working conditions, better benefits, and a supportive work environment. While many of our members are based at CDC headquarters in Georgia, we represent CDC employees located across the United States.

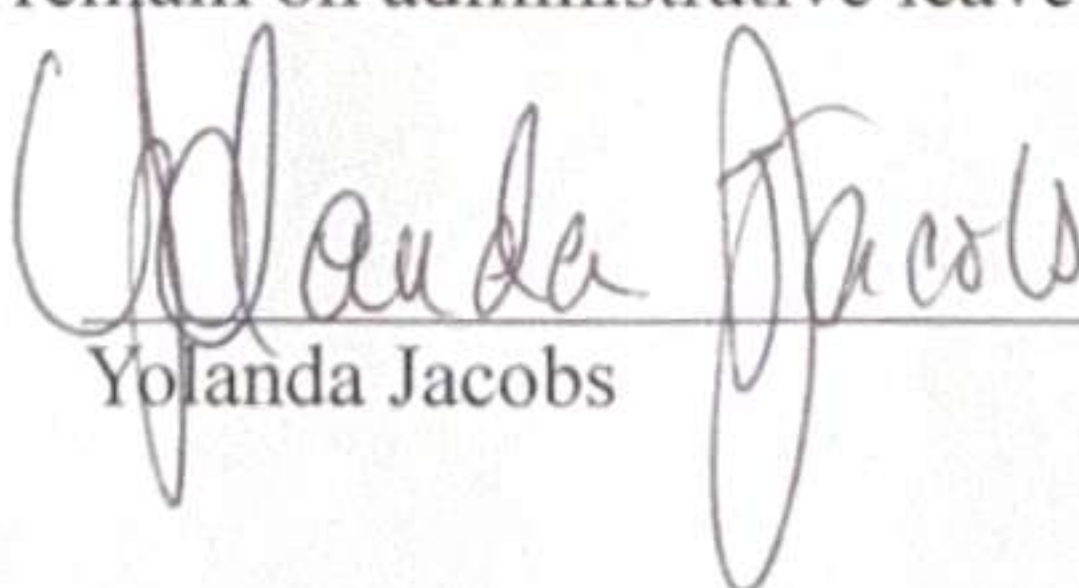
6. On April 1, 2025, approximately 2,674 CDC employees received RIF notices, with approximately 635 of those being our current members.

7. Of those RIF notices, it was evident to us that some of them had been issued in error. For example, some people received RIF notices that indicated that they worked in a different competitive area than the one where they actually worked. While their actual competitive area was not subject to RIFs, the competitive area listed (erroneously) on their RIF notices was subject to mass RIFs. I have notified the authorities of over a dozen of these erroneous termination notices since and following the April 1, 2025, notices that were distributed by email, but most of those errant termination notices have not been rescinded.

8. Beginning on or around June 10, 2025, CDC reinstated approximately 467 employees, by which I mean that employees were moved from administrative leave status to active-duty status. We have compiled this estimate based on reports from our members and public reporting. CDC has not been transparent and has not publicly confirmed these reinstatements, making our work very difficult.

9. Some employees who returned to active-duty status were able to return to performing the same work that they did prior to April 1. However, I also know of many employees who have not returned to performing the same work that they did prior to April 1. For instance, the Division of HIV Prevention (DHP) has directed workers to "reorient" toward shutting themselves down. Workers in that division were told that there was most likely no role for their work in the new "Administration for a Healthy America." They have not been allowed to work on new projects, but instead, are tasked with closing down programs. Furthermore, some of DHP's work was transferred to other parts of the National Center for HIV, Viral Hepatitis, STD, and Tuberculosis Prevention after the April 1 RIF. For example, HIV Nexus (<https://www.cdc.gov/hivnexus/hcp/index.html>), which provided information and resources for clinicians regarding HIV testing, prevention, and treatment, is now managed by the Center's Division of Viral Hepatitis. I also know of workers who have been transferred to work on matters unrelated to what they did prior to April 1.

10. According to a combination of our records and data shared with us, we estimate approximately 1,874 CDC employees in total have not been reinstated. These employees remain on administrative leave. Again, due to lack of transparency and no public confirmation of the number of reinstatements from HHS, it has been very difficult to track the exact number of our CDC employees and members that remain on administrative leave.


Yolanda Jacobs

Date: 7/23/2025